

JANET M. HEROLD  
Regional Solicitor  
IAN H. ELIASOPH  
Counsel for Civil Rights  
LAURA C. BREMER  
Senior Trial Attorney  
Office of the Solicitor  
UNITED STATES DEPARTMENT OF LABOR  
90 7th Street, Suite 3-700  
San Francisco, California 94103  
Tel: (415) 625-7757  
Fax: (415) 625-7772  
Email: robinson.kimberly@dol.gov

ce  
4-6/20/18  
PB

RECEIVED  
AUG 18 2017  
Office of Administrative Law  
San Francisco, CA 94103

UNITED STATES DEPARTMENT OF LABOR  
OFFICE OF ADMINISTRATIVE LAW JUDGES

OFFICE OF FEDERAL CONTRACT  
COMPLIANCE PROGRAMS, UNITED  
STATES DEPARTMENT OF LABOR,

Plaintiff,

v.

ORACLE AMERICA, INC.

Defendant.

Case No. 2017-OFC-00006

DECLARATION OF JANE SUHR

I, JANE SUHR, make this declaration, under the penalty of perjury.

1. I am employed as the Deputy Regional Director for the Pacific Region by the United States Department of Labor, Office of Federal Contract Compliance Programs ("OFCCP") an Agency of the United States government, with its business address at 90 7th Street, Suite 18-300 San Francisco, CA 94103. In that capacity, I oversee investigations

conducted by the OFCCP in the Pacific Region (covering Alaska, Arizona, California, Guam, Hawaii, Idaho, Nevada, Oregon, Washington), involving the enforcement of the Executive Order 11246, as amended, Section 503 of the Rehabilitation Act and Section 402 of the Vietnam Era Veterans' Readjustment Assistance Act. I have had oversight of the compliance review of Oracle America, Inc. at its headquarters location in Redwood Shores, CA since the compliance review was initiated in September of 2014.

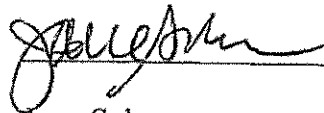
2. I possess personal knowledge of the matters set forth in this declaration. I am competent to testify to the same, and if called to testify my testimony would be as stated in this declaration.

3. On March 11, 2016, OFCCP issued a Notice of Violation ("NOV") to Oracle regarding the compliance review of its headquarters facility.

4. About two weeks after the NOV was issued, OFCCP invited Oracle to participate in a face-to-face meeting to discuss the issues identified by the NOV. Oracle and OFCCP engaged in extensive correspondence. On September 9, 2016, OFCCP again extended the invitation to Oracle to engage in a face-to-face meeting to discuss the issues identified by the NOV. Oracle accepted the invitation, and Oracle and OFCCP met on October 6, 2016.

5. I personally attended the October 6, 2016 conciliation meeting. This meeting was attended by the following counsel from Oracle: Gary Siniscalco & Erin Connell. Mr. Siniscalco admitted at this conciliation meeting that he personally conducted Oracle's pay equity analyses.

I swear under penalty of perjury that the foregoing is true to the best of my knowledge and that this document was executed on this 18th day of August, 2017 in San Francisco, California.



Jane Suhr  
Deputy Regional Director,  
OFCCP  
United States Department of Labor